

## Koch, Kristine

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**From:** MCCLINCY Matt <MCCLINCY.Matt@deq.state.or.us>  
**Sent:** Monday, April 20, 2015 8:47 AM  
**To:** Koch, Kristine  
**Cc:** Grandinetti, Cami; Robinson, Deborah; Cora, Lori; JOHNSON Keith; PARRETT Kevin  
**Subject:** RE: Portland Harbor - Follow-up from 4/9 EPA/DEQ Meeting

Kristine,

DEQ is **not** asserting that our eco population rule is an ARAR given the unique site specific evaluation that must be conducted, and DEQ's understanding that EPA does not consider state rules that require such evaluations to be ARARs.

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This spring, DEQ's Northwest Region Office will be moving to a new location - the 700 Lloyd Building at 700 NE Multnomah St., Suite #600, Portland, OR 97232. The date for operating at the new location is May 18<sup>th</sup>, 2015

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**From:** Koch, Kristine [mailto:Koch.Kristine@epa.gov]  
**Sent:** Monday, April 20, 2015 8:25 AM  
**To:** MCCLINCY Matt  
**Cc:** Grandinetti, Cami; Robinson, Deborah; Cora, Lori; JOHNSON Keith; PARRETT Kevin  
**Subject:** Portland Harbor - Follow-up from 4/9 EPA/DEQ Meeting

Matt – In the EPA/DEQ meeting last week, I had raised the question as to whether DEQ considered the following text from OAR 340-122 0115 as being ARAR for setting a standard of cleanup for ecological risk:

For populations of ecological receptors, a 10 percent or less chance that more than 20 percent of the total local population will be exposed to an exposure point value greater than the ecological benchmark value for each COC and no other observed significant adverse effects on the health or viability of the local population

I understand you to say it was not an ARAR for measuring residual risk at the Portland Harbor site. We would like written confirmation from DEQ on our understanding and whether or not the state is asserting this provision as ARAR for the Portland harbor cleanup.

Thank you,

Kristine Koch  
Remedial Project Manager  
USEPA, Office of Environmental Cleanup

U. S. Environmental Protection Agency  
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